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NALGE NUNC INTERNATIONAL CORPORATION

7
8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 LANI FELIX-LOZANO,

11 Plaintiff,

12 v.

13 NALGE NUNC INTERNATIONAL
14 CORPORATION,

15 Defendant.

) Case No. 2:08-CV-00854-JAM-DAD

) **STIPULATION FOR EXTENSION OF**
) **TIME FOR DEFENDANT TO RESPOND**
) **TO THE COMPLAINT; ORDER**

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17
18 WHEREAS, defendant NALGE NUNC INTERNATIONAL CORPORATION ("NNIC")
19 was properly served with the summons and complaint on June 17, 2008;

20 WHEREAS, pursuant to FRCP 12, NNIC is presently required to respond to the complaint
21 by July 7, 2008;

22 WHEREAS, this case is currently the subject of a motion to transfer and coordinate before
23 the United States Judicial Panel on Multidistrict Litigation (*In Re: Bisphenol-A (BPA)*
24 *Polycarbonate Plastic Products Liability*, MDL No. 1967);

25 WHEREAS, the motion to transfer and coordinate is set for hearing before the MDL Panel
26 on July 31, 2008;

27 WHEREAS, NNIC and plaintiff agree that, in the interest of efficiency, further pleadings in
28 this case should await the MDL Panel's decision on the motion to transfer and coordinate; and

1 WHEREAS, there have been no prior stipulations or orders in this case extending NNIC's
2 time to respond to the Complaint.

3 IT IS HEREBY STIPULATED by plaintiff and NNIC as follows:

4 1. The deadline for NNIC to answer or otherwise respond to the Complaint shall be
5 extended to the 30th day following the MDL Panel's decision on the motion to transfer and
6 coordinate now pending before the Panel in *In Re: Bisphenol-A (BPA) Polycarbonate Plastic*
7 *Products Liability*, MDL No. 1967); and

8 2. This Stipulation may be executed in counterparts.

9 DATED: June 30, 2008

STEPTOE & JOHNSON LLP

11 By /s/ Jason Levin

12 Jason Levin

13 Attorneys for NALGE NUNC INTERNATIONAL
CORPORATION

14 DATED: June 30, 2008

16 By /s/ Harold M. Hewell

17 Howard M. Rubinstein

Harold M. Hewell

18 Attorneys for plaintiff LANI FELIX-LOZANO

19 **IT IS SO ORDERED**

20 DATED: June 30, 2008

22 /s/ John A. Mendez

23 Hon. John A. Mendez

24 United States District Judge